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UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

* * *

Cameron Wiegand,

Plaintiff,
vs.

**State Farm Mutual Automobile
Insurance Company;** Messner Reeves
LLP; Steven Knauss; Jose Rivera; Ellen
Stoebling; Does 1 through 10, inclusive
and Roe Corporations 1 through 10,
inclusive,
Defendants.

Case No.: 2:23-cv-01000-CDS-DJA

**Stipulation and Order to Extend
Discovery Deadlines
(First Request)**

IT IS HEREBY STIPULATED AND AGREED by and between the parties hereto, by
and through their respective counsel of record, that the discovery deadlines in this
case be extended as follows:

A. COMPLETED DISCOVERY

The parties have conducted the following discovery:

1. Plaintiff has served his initial disclosure of witnesses and documents, and
supplements thereto;
2. Defendant has served its initial disclosure of witnesses and documents, and

1 supplements thereto;

2 3. Plaintiff has propounded and answered written discovery requests;

3 4. Defendant has propounded written discovery requests.

4
5 **B. OUTSTANDING DISCOVERY**

6 1. Disclosure of expert witnesses;

7 2. Depositions of the parties;

8 3. Depositions of fact witnesses;

9 4. Depositions of treating physicians;

10 5. Depositions of expert witnesses;

11 6. Additional written discovery;

12 7. Disclosure of additional documents.

13
14 **C. GOOD CAUSE EXISTS FOR AN EXTENSION**

15 Counsel for the parties have been diligent in conducting discovery but need
16 additional time to depose witnesses and gather documents. In order to produce
17 certain documents requested by Plaintiff, Defendant asserts that a protective order
18 is required. The parties have been diligently working on a stipulated protective order
19 and believe they are close to an acceptable compromise. These protected
20 documents are important for depositions and for the experts in this matter.
21 Therefore, there is good cause to extend the discovery deadline as requested.

D. PROPOSED EXTENDED DEADLINES

The parties have agreed to extend the discovery deadlines in this case as follows:

	CURRENT DEADLINE	PROPOSED DEADLINE
Motions to amend or add parties	February 12, 2024	April 12, 2024
Initial expert disclosures	March 14, 2024	May 13, 2024
Rebuttal expert disclosures	April 15, 2024	June 14, 2024
Close of Discovery	May 13, 2024	July 12, 2024
Dispositive motions	June 12, 2024	August 12, 2024
Pretrial Order	July 12, 2024	September 10, 2024 or, if dispositive motions are filed, 30 days after the entry of order on the dispositive motions.

Dated this 12th day of January, 2024.

H&P LAW

/s/ Marjorie Hauf

Marjorie Hauf, Esq.
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Attorney for Plaintiff

DATED this 12th day of January, 2024.

LEWIS BRISBOIS BISGAARD & SMITH

/s/ Frank Toddre II

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Attorney for Defendant

ORDER

IT IS SO ORDERED.

DATED this 16th day of January, 2024.


UNITED STATES MAGISTRATE JUDGE